

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN  
GREEN BAY DIVISION

---

JAMES BELTRAME  
on behalf of himself and all  
others similarly situated,

Plaintiff,

Case No. 20-cv-73

v.

SOUTHERN CROSS, LLC

Defendant

---

**JOINT MOTION FOR EXTENSION OF TIME  
TO ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT**

---

Plaintiff, James Beltrame, by and through his attorneys, Walcheske & Luzi, LLC, and Defendant, Southern Cross, LLC, by and through its attorneys, Johnson & Bell, Ltd., respectfully jointly seek an extension of time for Defendant to answer or otherwise respond to Plaintiff's Complaint. In support of this Motion, the parties state as follows:

1. On January 16, 2020, Plaintiff filed his Complaint against Defendant. (ECF No. 1.)
2. On March 4, 2020, an executed Waiver of Service on behalf of Defendant was filed with the Court. (ECF No. 5.)
3. Subsequent to March 4, 2020, Plaintiff's counsel and Defendant's counsel communicated directly regarding this matter.
4. On April 6, 2020, Plaintiff's counsel communicated with Defendant's counsel regarding that status of Defendant's Answer or other responsive pleading, which was due on or before April 3, 2020. Defendant's counsel assumed that the Eastern District of Wisconsin had

extended all deadlines twenty-one (21) days, as was done in the Northern District of Illinois. Plaintiff's counsel informed Defendant's counsel that the Eastern District of Wisconsin had not done so. Because of this honest mistake, Plaintiff's counsel and Defendant's counsel stipulated that the date by which Defendant could Answer or otherwise respond to the Complaint would be extended to on or before April 24, 2020.

5. Subsequent to the parties' communications on April 6, 2020, counsel for the parties inadvertently failed to file the appropriate and proper Joint Stipulation for Extension of Time to Answer or Otherwise Respond to Plaintiff's Complaint. Plaintiff's counsel takes responsibility for this oversight.

WHEREFORE, the parties respectfully request that the Court allow Defendant until April 24, 2020 to file an Answer or to otherwise respond to Plaintiff's Complaint.

Dated this 15th day of April, 2020

WALCHESKE & LUZI, LLC  
Counsel for Plaintiff

JOHNSON & BELL, LTD.  
Counsel for Defendant

s/ **Scott S. Luzi**  
Scott S. Luzi, State Bar No. 1067405  
WALCHESKE & LUZI, LLC  
15850 W. Bluemound Rd., Suite 304  
Brookfield, Wisconsin 53005  
Telephone: (262) 780-1953  
E-Mail: sluzi@walcheskeluzi.com

s/ **Stephen P. Ellenbecker**  
Stephen P. Ellenbecker  
JOHNSON & BELL, LTD.  
33 West Monroe Street, Suite 2700  
Chicago, Illinois 60603  
Telephone: (312) 984-0221  
E-Mail: ellenbeckers@jbltd.com